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8
9 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 JEFF DEWOLFE, an Individual,

11 Plaintiff,

12 v.

13 IDEACOM, a Foreign Corporation; DOES
14 I-X; ROE CORPORATIONS I -X,

15 Defendants.
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CASE NO.: 2:21-cv-01995-GMN-VCF

**STIPULATION TO CONTINUE THE IN-
PERSON HEARING ON:**

- (1) **DEFENDANT’S MOTION FOR
CASE TERMINATING
SANCTIONS OR IN THE
ALTERNATIVE, MOTION TO
COMPEL [ECF 27];**
(2) **HEARING ON THE MOTION FOR
LEAVE TO FILE EXCESS PAGES
[ECF 26]; and**
(3) **THE PARTIES’ PROPOSED
STIPULATION AND ORDER TO
FOR SETTLEMENT
CONFERENCE AND TO STAY
CERTAIN DEADLINES PENDING
SETTLEMENT CONFERENCE
[ECF 45]**

(Second Request)

24 Plaintiff Jeff DeWolfe (“Plaintiff”), and Defendant IDEACOM (“Defendant”), by and
25 through their respective attorneys of record, stipulate as follows:

- 26 1. On January 5, 2023, Defendant filed its Motion for Case Terminating Sanctions
27 or in the Alternative, Motion to Compel. [ECF 27].
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1 2. Defendant also filed a motion for leave to file a brief in excess of the page limits
2 on the same date. [ECF 26].

3 3. The Court previously set these motions for an in-person hearing on March 21,
4 2023. [ECF 39, 40].

5 4. On March 14, 2023, as Defendant's Counsel had a conflict at the time set for
6 March 21, 2023 hearing, the parties requested the Court continue the hearing to the next
7 available date and time on the Court's calendar. [ECF 41].

8 5. On March 17, 2023, the Court approved the parties' stipulation and rescheduled
9 the in-person hearing to March 29, 2023, at 11:00 a.m. [ECF 43].

10 6. On February 28, 2023, Defendant filed its Motion for Summary Judgment
11 ("Motion"). [ECF 36].

12 7. Plaintiff's response to Defendant's Motion was due to be filed by March 28,
13 2023. [ECF 44].

14 8. During this time, the parties have engaged in limited settlement discussions but
15 believe that a settlement conference would increase the likelihood of settlement.

16 9. On March 24, 2023, the parties submitted their proposed stipulation requesting:
17 (a) the Court order the parties to a settlement conference pursuant to LR 16-5; (b) continue the
18 deadline for Plaintiff to respond to Defendant's Motion for Summary Judgment to a date no
19 more than five days after the conclusion of the settlement conference; and (c) continue the
20 March 30, 2023 dispositive motion deadline and May 1, 2023 due date for the parties to submit
21 their Joint Pre-Trial Order per ECF 38 to mutually agreeable dates after the conclusion of the
22 settlement conference to enable the parties to participate in a settlement conference. [ECF 45].

23 10. On March 27, 2023, the Court added the parties' March 24, 2023 stipulation
24 (ECF 45) to the in person hearing scheduled for 11:00 a.m. on March 29, 2023. [ECF 46].

25 11. Plaintiff's counsel of record, Jenny L. Foley, Ph.D., Esq., has a conflict at the
26 time set for the March 29, 2023, hearing due to a deposition in another client matter.

27 12. Given the substantive issues involved in the motions set for hearing, the parties
28

1 request the Court continue the March 29, 2023, hearing to the next available date and time on
2 the Court's calendar so that Plaintiff's counsel of record can attend the in-person hearing.

3 13. This is the second request for an extension of the hearing and is not made for
4 purposes of undue delay.

5 Dated: March 28, 2023.

6 **HKM EMPLOYMENT ATTORNEYS, LLP** **WILSON, ELSER, MOSKOWITZ,**
7 **EDELMAN & DICKER LLP**

8 */s/ Michael Arata*

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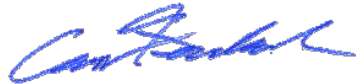
Facsimile: (702) 727-1401

Attorneys for Defendant

16 **ORDER**

17 **IT IS SO ORDERED:**

18 IT IS SO ORDERED.

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20 Cam Ferenbach

21 United States Magistrate Judge

22 DATED 3-28-2023

23
24 IT IS HEREBY ORDERED that the hearing scheduled for March 29, 2023, is
25 RESCHEDULED to an in-person hearing for 11:00 AM, April 3, 2023, in Courtroom
26 3D.
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